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Attorney for Defendant Larry J. Gerrans

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA ) CASE NO. CR 18-00310 EMC  
v. )  
LARRY J. GERRANS, ) REQUEST TO CONTINUE DUE DATE FOR  
Defendant. ) DEFENSE RESPONSE TO UNITED STATES'  
 ) OPPOSITION TO DEFENDANT'S NOTICE FOR  
 ) RELEASE TO MARCH 26, 2020; [PROPOSED]  
 ) ORDER

## BASIS FOR REQUEST

On March 17, 2020, prior counsel for defendant Larry Gerrans filed a Motion to Set Terms of Release Pending Sentencing. The government filed its Opposition on March 20, 2020 and defendant's Reply is currently due on March 23, 2020.

On March 20, 2020, undersigned counsel filed a Notice of Appearance of Counsel and Substitution of Counsel. Later that day, counsel reviewed the government's opposition to the defense motion for release.

The defense agrees with the government that Mr. Gerrans' current medical condition is relevant to the defense's motion for release. Undersigned counsel has not yet been able to meet with Mr. Gerrans,

1 but she is hoping that she can at least get signed medical releases from him on Monday, March 23, 2020  
2 so that she can attempt to obtain and review his medical records, which she has reason to believe may be  
3 relevant to the defense's motion for release. If counsel is able to get the records quickly, she can file the  
4 Reply earlier than March 26. There is no prejudice to the government in continuing the due date of Mr.  
5 Gerrans' Reply as Mr. Gerrans is currently in custody at the San Francisco Jail.

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7 Dated: March 23, 2020

Respectfully submitted,

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11 /s/  
12 SHAWN HALBERT  
13 Counsel for Defendant Larry J. Gerrans  
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1 [PROPOSED] ORDER  
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For good cause shown, IT IS HEREBY ORDERED that the date for the defense response to the  
Government's Opposition to Defendant's Motion to Release shall be continued to March 26, 2020.

4 Date: \_\_\_\_\_  
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/s/  
6 Honorable Edward M. Chen  
7 United States District Court  
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